

The Honorable James L. Robart

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

AMAZON.COM, INC., a Delaware  
corporation, AMAZON.COM SERVICES  
LLC, a Delaware limited liability company,  
and AMAZON TECHNOLOGIES, INC., a  
Nevada corporation,

Plaintiffs,

v.

Does 1-20, unknown parties doing business as  
“REKK,” and the following individuals:  
Domantas Radeckas, Noah Page, Skylar  
Robinson, Luke Colvin, Alejandro Taveras,  
Andrew Ling, Brandon Sukhram, Cosmin  
Sopca, Jenny Tran, Olaf Booij, and Ryan  
Bates,

Defendants.

No. 2:23-cv-01879-JLR

**PLAINTIFFS’ STATUS REPORT**

Plaintiffs Amazon.com, Inc., Amazon.com Services LLC, and Amazon Technologies, Inc., (“Amazon”) submit this Status Report in accordance with the Court’s April 16, 2024 Order. Dkt. 77. In the last 60 days, Amazon has made great strides in unmasking the operators behind REKK. Amazon has filed an Amended Complaint, Dkt. 89, naming Domantas Radeckas as the primary operator of REKK and revealing his new refund fraud operation named DIVO. Furthermore, Amazon has begun productive settlement discussions with two of the remaining 6

1 unserved defendants, reaching an agreement in principle with one. Amazon will work diligently  
 2 to serve the remaining unserved defendants with the Amended Complaint and to unmask any  
 3 remaining REKK Operator Defendants.

4 **A. Unmasking of Domantas Radeckas and Filing of the Amended Complaint**

5 Amazon investigators reviewed the information received from the subpoena responses  
 6 received from Google, Reddit, Pentagon, Federal Credit Union, and PayPal. Following that  
 7 review, Amazon discovered at least one REKK Operator Defendant, Domantas Radeckas, who  
 8 resides in Lithuania. Amazon also discovered that Domantas Radeckas resumed his fraudulent  
 9 activities as DIVO. On June 13, 2024, Amazon filed its Amended Complaint, naming Domantas  
 10 Radeckas and including information regarding DIVO's activities. Dkt. 89. Within an hour of  
 11 filing, both DIVO's Telegram channels were wiped. Declaration of Macaulay Ivory ("Ivory  
 12 Decl.") ¶2.

13 **B. Efforts to Identify Unnamed Defendants**

14 As to Does 1-20, Amazon intends to file another Motion for Expedited Discovery to  
 15 uncover the identities of any remaining REKK Operator Defendants. During its investigation,  
 16 Amazon uncovered additional email addresses and bank accounts that may uncover Domantas  
 17 Radeckas's co-conspirators.

18 As discussed in Amazon's Response to Show Cause Order, Amazon has identified  
 19 individuals linked to accounts transferring money to facilitate the scheme. One of those  
 20 individuals is located in a country that is not a signatory to The Convention on the Taking of  
 21 Evidence Abroad in Civil or Commercial Matters, which complicates Amazon's investigation.  
 22 Nevertheless, Amazon believes that individual possesses information regarding other potential  
 23 REKK Operator Defendants and is continuing its investigation.

24 **C. Current Procedural Status of Case Against the 27 Named Defendants**

25 **1. 20 Defendants Served and/or Resolved**

26 Amazon has resolved its claims with 16 individual defendants, including Charalampos  
 27 Gkatzoulas. *See* Ivory Decl. ¶ 3.

Amazon served and moved for entry of default against 5 individual defendants,<sup>1</sup> which this Court granted on January 31, 2024. Dkt. 27. Amazon believed it had a settlement agreement with Ryan Bates; however, Bates breached the agreement and Amazon moved for an entry of default, which this Court granted on May 16, 2024. Ivory Decl. ¶ 4; Dkt. 88. Amazon is continuing to conduct discovery and intends on moving for final judgment once that is complete.

## 2. 6 Defendants Awaiting Service

Amazon has not yet served the remaining 6 individual defendants, who are made up of 4 E.U.-based defendants and 2 U.S.-based defendants.

On December 13, 2023, Amazon initiated service under The Convention on the Service Abroad of Judicial and Extrajudicial Documents (“The Convention”) to the respective Hague ministries on the following 4 E.U.-based defendants: Charalampos Gkatzoulas, Cosmin Sopca, Jenny Tran, and Olaf Booij. Ivory Decl. ¶ 5. Amazon will need to reinitiate service under The Convention to serve the Amended Complaint and will send the remaining international defendants requests for waivers of service of summons. Amazon has an agreement in principle with Mr. Gkatzoulas and has had productive settlement discussions with Ms. Tran. Amazon anticipates entering stipulated injunctions and voluntary dismissals for those two defendants within the next 60 days.

As to the 2 U.S.-based defendants, Amazon has unsuccessfully attempted service on the other two (Luke Colvin and Andrew Ling) multiple times. Amazon attempted to serve Luke Colvin on December 13, 2023, January 3, 2024, June 7, 2024, and June 10, 2024, at three separate addresses. *Id.* at ¶ 7. Amazon attempted to serve Andrew Ling on December 13, 2023, and April 16, 2024 at four separate addresses. *Id.* at ¶ 7. From these attempts, Amazon learned that Defendant Colvin moved out of state and currently attends Olivet Nazarene University in Bourbonnais, Illinois, and Defendant Ling also moved and his current physical addresses is currently unknown. *Id.* Amazon is working with the process servers, and will likely initiate

<sup>1</sup> Dylan Hinz, Brandon Sukhram, Alejandro Taveras, Noah Page, and Skylar Robinson.

1 service of the Amended Complaint at his university through the local sheriff's department within  
2 30 days. *Id.* Amazon will continue to investigate for options to serve Andrew Ling.

3 To the extent that the 6 remaining named Defendants cannot be served in a timely fashion  
4 and cannot be located, Amazon anticipates that it will move for permission to serve them via  
5 alternative means, such as email.

6 DATED this 17th day of June, 2024.

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23 I certify that this memorandum contains 770  
24 words, in compliance with the Local Civil  
25 Rules.  
26  
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